

United States v. John Stuart
21-CR-07-LJV-JJM

Defendant's Exhibit A

From: [Jeffrey Bagley](#)
To: ["Rudroff, David \(USANYW\)"](#)
Subject: RE: John Stuart: Protective Order
Date: Thursday, December 22, 2022 3:18:00 PM

Sure thing.

Jeffrey T. Bagley
Assistant Federal Public Defender

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: Rudroff, David (USANYW) [REDACTED]
Sent: Thursday, December 22, 2022 3:16 PM
To: Jeffrey Bagley [REDACTED]
Subject: RE: John Stuart: Protective Order

I understand. I will file a consent motion tomorrow.

If I send you documents before it is formally entered, can we agree to treat them in accordance with the anticipated PO? If so, I can likely get you what I have a few days faster.

David J. Rudroff | Assistant United States Attorney | United States Attorney's Office | Western District of New York

[REDACTED]
[REDACTED]

From: Jeffrey Bagley [REDACTED]
Sent: Thursday, December 22, 2022 9:57 AM
To: Rudroff, David (USANYW) [REDACTED]
Subject: [EXTERNAL] RE: John Stuart: Protective Order

Dave – I don't have a problem with this as it stands now. Obviously, I may ask for parts or all lifted if I feel it appropriate after reviewing the materials.

Jeffrey T. Bagley
Assistant Federal Public Defender

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: Rudroff, David (USANYW) [REDACTED]
Sent: Friday, December 16, 2022 2:11 PM
To: Jeffrey Bagley [REDACTED]
Subject: John Stuart: Protective Order

Jeff,

I've attached the government's proposed protective order. Let me know your thoughts.

**David J. Rudroff | Assistant United States Attorney | United States Attorney's Office |
Western District of New York**

[REDACTED]
[REDACTED]